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January 4, 2022

**VIA U.S. MAIL & ELECTRONIC MAIL**

Ms. Catherine Chiccine  
Site Attorney  
United States Environmental Protection Agency  
Region 7  
11201 Renner Blvd.  
Lenexa, KS 66219  
Email: [chiccine.catherine@epa.gov](mailto:chiccine.catherine@epa.gov)

Re: *Special Notice Letter for Operable Unit 4 of the Findett Corporation  
Superfund Site in St. Charles, Missouri, EPA ID No. MOD00633975*

Dear Ms. Chiccine:

I am writing on behalf of Ameren Missouri (“Ameren”) to convey Ameren’s good faith offer in response to your recent Special Notice letter for the above-referenced matter. As you may be aware, Ameren has been working cooperatively with EPA on this project for several years. The project always has been on a fast track, and therefore somewhat unusual, in that Ameren’s progress in the field always has been more advanced than the related administrative documentation. For example, Ameren already had finished an investigation to the satisfaction of EPA and had identified an appropriate remedy, long before the RI/FS documentation was finalized. Likewise, Ameren successfully has been performing the remedy identified in the ROD under EPA’s close supervision for the past several years and we are nearing completion. We therefore have no doubt that this cooperative relationship will continue as Ameren continues to perform EPA’s selected remedy, but Ameren still reserves all rights and defenses available to it in this matter and makes no admission of law or fact in presenting this good faith offer.

One of Ameren’s priorities moving forward in response to the Special Notice letter will be to keep the RD/RA documentation as simple, straightforward and streamlined as possible in light of the advanced stage of our field work. Just as we accomplished during the RI/FS process, the goal will be to avoid redundancy and unnecessary efforts and to have a Consent Decree and work plan that reflect the fact that much of the work already has been either completed to the satisfaction of EPA or is in progress under EPA’s supervision. Ameren has enjoyed a good working relationship with the EPA project manager for the past several years, we already have demonstrated our obvious financial and technical ability to implement the remedy selected in the ROD, and we already have established a process and a track record for reimbursing EPA response costs. Ameren is therefore confident that we can reach final agreement on a consent decree and

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scope of work that reflect the status of Ameren's efforts, while being as efficient as possible under the circumstances.

We hope to be discussing a path forward on work plan issues with Mr. Sperry in the near future, and we expect that as those issues are resolved, there may be a need for some new Consent Decree language that reflects the work plan details. The relatively unusual challenge during that process will be to have a consent decree that allows for and recognizes the fact Ameren's completed work and related reports must be incorporated into the Consent Decree requirements. We look forward to discussing those issues with you as they arise, but the key will be to have our technical staff and Mr. Sperry explore the most efficient way to achieve those objectives. In order to get this process moving as fast as possible, we would like to propose a conference call during the last week in January. Please let us know your availability and we can take it from there.

I look forward to working with you on this project.

Sincerely,

*/s/ Joseph F. Madonia*  
Joseph F. Madonia

JFM:ljm